

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

JESSICA JONES, et al.,

Plaintiffs,

v.

VARSITY BRANDS, LLC, et al.

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

JURY DEMAND

DECLARATION OF KEVIN E. RAYHILL

I, Kevin E. Rayhill, declare and state as follows:

I am an attorney at the Joseph Saveri Law Firm, LLP (“JSLF”), counsel for Plaintiffs Jessica Jones and Christina Lorenzen (“Plaintiffs”) in *Jones, et al. v. Bain Capital Private Equity, at el.*, case no. 2:20-cv-02892-SHL-tmp. I am a member in good standing of the State Bar of California and have been admitted pro hac vice in this Court. I am over 18 years of age and have personal knowledge of the facts stated in this Declaration. If called as a witness, I could and would testify competently to them.

1. Attached hereto as Exhibit 1 is a true and correct copy of an email I sent to Varsity Counsel Steven Kaiser on April 10, 2022.

2. Attached hereto as Exhibit 2 is a true and correct excerpt from the deposition transcript of Jamie Parrish, taken on March 3, 2022.

3. Attached hereto as Exhibit 3 is a true and correct excerpt from the deposition transcript of Tres Letard, taken on November 22, 2021.

4. Attached hereto as Exhibit 4 is a true and correct copy of a document produced by Defendants in this action with the Bates number VAR00079853, which was introduced as Exhibit 28 at the deposition of Leslie Wright.

5. Attached hereto as Exhibit 5 is an article entitled “Accused Cheer Monopolist Varsity Squares Off Against Ex-Employees”, written by Daniel Libit and published on October 12, 2021. The article was downloaded on March 10, 2022 under my direction and is available for download at <https://sports.yahoo.com/accused-cheer-monopolist-varsity-squares-040106598.html>.

6. Attached hereto as Exhibit 6 is a true and correct copy of a document entitled Initial Disclosures of the Varsity Defendants, Charlesbank Capital Partners, LLC, and Bain Capital Private Equity, LP, which was served on Plaintiffs on January 26, 2021.

7. Attached hereto as Exhibit 7 is a true and correct copy of a document produced by Defendants in this action with the Bates number VAR00323450, which was introduced as Exhibit 4 in the deposition of Brian Elza.

8. Attached hereto as Exhibit 8 is a true and correct copy of a document produced by Defendants in this action with the Bates number VAR00101100, which was introduced as Exhibit 5 in the deposition of Brian Elza.

9. Attached hereto as Exhibit 9 is a true and correct copy of a document produced by Defendants in this action with the Bates number VAR00342340, which was introduced as Exhibit 34 in the deposition of Nicole Lauchaire.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on April 11, 2022.

/s/ Kevin E. Rayhill
Kevin E. Rayhill